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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. Case No. 3:23-cv-06708-CRB
D. Ariz. Case No. 2:25-cv-04276-CRB

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF UBER'S
OPPOSITION TO PLAINTIFF'S MOTION
[4946] TO STRIKE UBER'S JANUARY 6,
2026 CLAWBACK NOTICE AND TO
PROHIBIT FUTURE CLAWBACKS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION

JAYLYNN DEAN,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., et al.,

Defendants.

CASE NO. 25-cv-4276-PHX-CRB

Judge: Hon. Charles R. Breyer

Courtroom: 501

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at Kirkland & Ellis LLP, counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Opposition to Plaintiff’s Motion [4946] to Strike Uber’s
5 January 6, 2026 Clawback Notice and to Prohibit Future Clawbacks.

6 2. Attached as Exhibit 1 is a true and correct copy of a letter from Michael B. Shortnacy,
7 dated January 7, 2026.

8 3. Attached as Exhibit 2 is a true and correct copy of an email from Rachel Goldman, dated
9 August 24, 2025.

10 4. Attached as Exhibit 3 is a true and correct copy of the Master Privilege Determinations
11 Clawback Category 2, dated July 18, 2025.

12 I declare under penalty of perjury under the laws of the United States of America that the foregoing
13 is true and correct.

14 Dated: January 9, 2026

15 /s/ Laura Vartain Horn
16 Laura Vartain Horn